

Kudson's Bay Company

INCORPORATED 2" MAY 1870

March 1, 2000

Mr. Vernon A. Williams, Secretary Surface Transportation Board Office of the Secretary Case Control Unit Attn: STB Ex Parte No. 582 1925 K Street, N.W. Washington, D.C. 20423-0001

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Office of the Secretary

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Part of Public Record



Dear Sir.

The Hudson's Bay Company is a retail company that is a major user of rail service in the U.S. and Canada. The purpose of this letter is to comment on the issues to be discussed on March 8th. 2000 in Ex Parte 582,

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination, or any merger for that matter, is good for shippers. The CN-BNSF combination should be judged on its merits.

Service, not timing, of the proposed CN-BNSF combination is the central issue for our company. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination or any other future mergers, will deliver service.

We trust that the Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public Interest. It should fairly evaluate the CN-BNSF combination according to that process.

We do wonder whether the other railroads opposition to the use of the Surface Transportation Board process is an effort to insulate themselves from competition rather than as a protection for shippers.

Sincerely,

Peter A. Kenyon

Executive Vice President

Logistics, Distribution and Transportation

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